

Weldon Reed Allmand  
State Bar No. 24027134  
ALLMAND LAW FIRM, P.L.L.C.  
5646 Milton St., Ste 120  
Dallas, TX 75206  
214.265.0123 Phone  
214.265.1979 Fax

ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

|                            |   |                          |
|----------------------------|---|--------------------------|
| <b>ERVIN FRANK LAYER</b>   | § | <b>CASE NO. 13-30466</b> |
|                            | § |                          |
| <b>Debtor</b>              | § | <b>CHAPTER 13</b>        |
| <hr/>                      |   |                          |
| <b>JPMORGAN CHASE BANK</b> | § |                          |
| <b>Movant</b>              | § |                          |
|                            | § |                          |
| <b>VS.</b>                 | § |                          |
|                            | § |                          |
| <b>ERVIN FRANK LAYER</b>   | § |                          |
|                            | § |                          |
| <b>Debtor</b>              | § |                          |

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW **Ervin Frank Layer**, Debtor in the above-styled and numbered cause, and in response to the Motion for Relief from Stay of **JPMORGAN CHASE BANK**, ("Movant") in regard to the collateral referenced in Movant's motion.

Debtor respectfully shows:

1. The allegations of **Movant** contained in paragraphs 1, 2 and 3 of the motion are admitted.
2. The allegations of **Movant** contained in paragraphs 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 and 15 of the motion are denied.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that Movant's Motion For Relief From Automatic Stay be denied and for such other and further relief as the Court may deem just and appropriate.

Dated: August 1, 2014.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Weldon Reed Allmand

Weldon Reed Allmand

State Bar No. 24027134

ALLMAND LAW FIRM, P.L.L.C.

5646 Milton St., Ste 120

Dallas, TX 75206

214.265.0123 Phone

214.265.1979 Fax

ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 1, 2014, a true and correct copy of the foregoing Response to Motion For Relief From Stay was served on the following parties in interest by first class mail or electronic notice:

**CHAPTER 13 TRUSTEE**

125 E. John Carpenter Freeway  
11th Floor, Suite 1100  
Irving, TX 75062

**U.S. TRUSTEE**

William T. Neary  
1100 Commerce, Room 976  
Dallas, TX 75242

**DEBTOR**

Ervin Frank Layer  
9814 Faircrest Drive  
Dallas, TX 75238

**OPPOSING COUNSEL**

Angela K Randermann  
Codilis & Stawiarski, P.C.  
650 N. Sam Houston Pkwy. E. Ste. 450  
Houston, TX 77060

**OTHER PARTIES IN INTEREST**

Lee S. Raphael  
20750 Ventura Blvd. Suite 100  
Woodland Hills, CA 91367

Sherrel K. Knighton  
Linebarger, Goggan, Blair & Sampson, LLP  
2777 N. Stemmons Frwy Ste 1000  
Dallas, TX 75207

Eboney D. Cobb  
Perdue Brandon Fielder Collins & Mott  
4025 Woodland Park Boulevard, Suite 300  
Arlington, TX 76094

Christopher Anthony Villa  
Perdue Brandon Fielder, et. al, LLP  
4025 Woodland Park Blvd., Ste. 300  
Arlington, TX 76013

By: /s/ Weldon Reed Allmand

Weldon Reed Allmand  
State Bar No. 24027134